

Annex 4b: Credit Record Checks for COVID-19 tests

The Health Service Journal has confirmed¹ that the Government process² to request a COVID-19 test by post requires applicants to have a credit record.

There are legitimate reasons for Government to ensure that it doesn't send tens or hundreds of tests to the same postal address – thereby allowing resale – but it is notable that the “simplest” approach Government chose to do this was to make checks with a commercial data provider which, by definition, require a person to have a track record.

The check being done is not a credit check, which determines whether a person should get credit, but rather a check to see whether a footprint (of transactions) exists which would form the *basis* for a credit decision. By definition such checks are exclusionary for some people, especially those who may find themselves in unusual residences.

Quite aside from those acknowledged to be vulnerable, such as those who are ‘unbanked’ and people with ‘complicated lives’, such credit footprints are least likely to exist for those who have moved – including from abroad – and people whose credit record has not yet caught up with where they currently live. Thus some of the people most likely to *fail* these commercial checks are amongst the most likely to *need* a test.

HMG runs the testing service; it could quite simply have checked the data it collected from tests previously issued, looking for large numbers of kits sent to the same postal address or results sent to the same mobile phone number, and following up as necessary. As with most fraud, the actual numbers would likely be so low as to be irrelevant – and the number of people being blocked from receiving a test would remain hidden in Government. (If indeed it is even collecting figures at all...)

There is notionally a ‘counter-fraud’ profession in Government, “do a credit record check” aside. That this ‘profession’ apparently has nothing to offer in the single biggest emergency situation in recent memory shows how far it still has to go before being worthy of the term.

As the NHS begins to take over and replace this service,³ NHS Digital should remove the exclusionary check with the commercial provider, and – if a particular address and phone number combination does appear to be ordering a questionable number of tests – PHE should



Order a home test kit

You can now order a coronavirus (COVID-19) home test kit.

Who can have the test

The test is only for people who have [symptoms of coronavirus](#) – whether that's you, or someone you live with.

In England and Wales, children of all ages can have the test. In Scotland and Northern Ireland, testing is only available for children aged 5 and over.

What is the test

The test is an 'antigen test'. It tests if you currently have coronavirus. It usually involves taking a swab of the inside of your nose and the



¹ <https://www.hsj.co.uk/coronavirus/revealed-online-covid-tests-refused-to-those-not-on-credit-check-database/7027794.article>

² This is a GOV.UK service with a black GOV.UK logo; specifically *not* an NHS service with a blue NHS logo.

³ <https://www.digitalmarketplace.service.gov.uk/digital-outcomes-and-specialists/opportunities/12470>

give them a call, find out which crack in the patchwork of response they have fallen through, and offer assistance; clearly the Government prefers not to know.